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6  
7 UNITED STATES DISTRICT COURT  
8 SOUTHERN DISTRICT OF CALIFORNIA  
9 (HONORABLE WILLIAM Q. HAYES)

10 UNITED STATES OF AMERICA,  
11 Plaintiff,  
12 v.  
13 ALEJANDRO AMEZCUA-MANZO,  
14 Defendant.

CASE NO. 08-cr-298-WQH (BLM)

JOINT MOTION TO MODIFY BOND CONDITIONS

15  
16 **THE UNDERSIGNED HEREBY STIPULATE AND AGREE** that for good cause, the  
17 bond conditions for Mr. Amezcua-Manzo should be expanded to permit travel throughout California.

18 **SO STIPULATED.**

19 Dated: June 24, 2008

/s/ Gregory Murphy  
GREGORY MURPHY  
Federal Defenders of San Diego, Inc.  
Attorneys for Mr. Amezcua-Manzo

22 Dated: 6-25-08

Alejandro Amezcua-Manzo  
ALEJANDRO AMEZCUA-MANZO  
Defendant

24 Dated: 6/26/08

/s/ Aaron Clark  
AARON CLARK  
Assistant United States Attorney

26 Dated: 6-25-08

MATEO D. BACILLO  
MATEO BACILLO  
Surety

28 Dated: 6-25-08

Michael Roy Zinn  
MICHAEL ROY ZINN  
SURETY

Dated: 6/26/08

Irene Pflaum  
Irene Pflaum  
... Trial Services officer

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA  
(HONORABLE WILLIAM Q. HAYES)

UNITED STATES OF AMERICA,	)	Case No. 08CR0298-WQH (BLM)
	)	
Plaintiff,	)	
	)	
v.	)	MEMORANDUM IN SUPPORT OF MOTION TO
	)	MODIFY BOND CONDITIONS
ALEJANDRO AMEZCUA-MANZO,	)	
	)	
Defendant.	)	

Alejandro Amezcua-Manzo, through undersigned counsel Gregory T. Murphy and Federal Defenders of San Diego, Inc., respectfully submits the following memorandum in support of the joint motion to modify the terms of his supervised release.

**I.**

**STATEMENT OF THE CASE**

Mr. Amezcua-Manzo was arrested on January 24, 2008, On January 28, 2008, this Court set conditions of release. These included a travel restriction to the Central and Southern Districts of California. Mr. Amezcua-Manzo was released on bond on March 3, 2008.

On June 19, 2008, Mr. Amezcua-Manzo pleaded guilty to Misprision of Felony, in violation of 18 U.S.C. § 4. Pursuant to the plea agreement, his total offense level under the advisory guidelines is 2. Both parties recommend a time-served sentence.

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1 Mr. Amezcua-Manzo is an agricultural worker. In mid-summer, when the grape harvest is complete,  
2 his work requires him to travel north to harvest other produce in the Northern and Eastern districts.

3 Mr. Amezcua-Manzo has complied fully with the conditions of his release, including the travel  
4 restriction. He now asks the Court to modify his conditions to permit travel throughout California. An officer  
5 of pretrial services, the prosecutor and both sureties have signed a stipulation supporting that request.

6 **II.**

7 **CONCLUSION**

8 For the foregoing reason, Mr. Amezcua-Manzo asks the Court to modify the conditions of his pretrial  
9 release to permit travel throughout California.

10 Respectfully submitted,

11  
12 DATED: June 27, 2008

13 /s/ Gregory T. Murphy  
14 **GREGORY T. MURPHY**  
15 Federal Defenders of San Diego, Inc.  
16 Attorneys for Alejandro Amezcua-Manzo  
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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA  
(HONORABLE WILLIAM Q. HAYES)

UNITED STATES OF AMERICA,	)	Case No. 08CR0298-WQH-01
	)	
Plaintiff,	)	
	)	
v.	)	<b>CERTIFICATE OF SERVICE</b>
	)	
ALEJANDRO AMEZCUA-MANZO,	)	
	)	
Defendant.	)	

Counsel for Defendant certifies that the foregoing pleading is true and accurate to the best of his information and belief, and that a copy of the foregoing document has been served this day upon:

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Marc Xavier Carlos  
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Respectfully submitted,

DATED: June 27, 2008

/s/ Gregory T. Murphy  
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Federal Defenders of San Diego, Inc.  
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